IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS **DALLAS DIVISION**

JASON COLEMAN and JESSICA CASEY, on behalf of the RVNB Holdings, Inc. Employee Stock Ownership Plan, and on behalf of a class of all other persons similarly situated, Plaintiffs, v.

Civil Action No. 3:20-cv-01358-E

NEIL M. BROZEN, et al.,

Defendants.

NOTICE OF FILING OF PROPOSED GLOBAL SETTLEMENT AGREEMENT

Thomas R. Ajamie John S. "Jack" Edwards, Jr.

AJAMIE LLP

Pennzoil Place - South Tower 711 Louisiana, Ste 2150 Houston, TX 77002 Tel: (713) 860-1600 Fax: (713) 860-1699 tajamie@ajamie.com

jedwards@ajamie.com

Gregory Y. Porter (pro hac vice)

Ryan T. Jenny (pro hac vice) James Kauffman (pro hac vice)

Alexandra Serber (pro hac vice)

BAILEY & GLASSER LLP

1055 Thomas Jefferson St., Ste 540

Washington, DC 20007

Tel: (202) 463-2101 Fax: (202) 463-2103

gporter@baileyglasser.com

rjenny@baileyglasser.com

jkauffman@baileyglasser.com

aserber@baileyglasser.com

Attorneys for Plaintiffs Jason Coleman & Jessica Casey

Micah Randall Prude Micah.prude@hklaw.com HOLLAND & KNIGHT LLP 1722 Routh St., Ste 1500 Dallas, Texas 75201 Telephone: (214) 969-1795

Facsimile: (214) 880-3113

Todd D. Wozniak (admitted *pro hac vice*)

todd.wozniak@hklaw.com

Lindsey R. Camp (admitted pro hac vice)

lindsey.camp@hklaw.com

HOLLAND & KNIGHT, LLP

1180 West Peachtree St. NW

Atlanta, Georgia 30309 Telephone: (404) 817-8500

Facsimile: (404) 881-0470

ATTORNEYS FOR DEFENDANTS ROBERT PETERSON, JR., VASILIA PETERSON, MIKE PAXTON, NICK BOURAS, STERLING INVESTMENT PARTNERS III, L.P., NICOLE PETERSON 2012 IRREVOCABLE TRUST, AND BROOKE PETERSON 2012 IRREVOCABLE **TRUST**

PLEASE TAKE NOTICE that on February 20, 2025, I filed with the Clerk of the United States District Court for the Northern District of Texas, Dallas Division, via the CM/ECF system, a Notice of Filing of Proposed Global Settlement Agreement and its referenced document, the Global Settlement Agreement and accompanying exhibits entered into between the parties in this matter.

Respectfully submitted,

By: /s/ Peter B. Allport Attorney for Defendant Neil M. Brozen

Nicole Figueroa McDermott Will & Emery LLP 2501 North Harwood Street, Suite 1900 Dallas, Texas 75201-1664 Telephone: (214) 295-8081

Facsimile: (972) 232-3098 Email: nfigueroa@mwe.com

J. Christian Nemeth (admitted pro hac vice)

McDermott Will & Emery LLP 444 West Lake Street, Suite 4000 Chicago, Illinois 60606

Telephone: (312) 372-2000 Facsimile: (312) 984-7700 Email: jcnemeth@mwe.com

Peter B. Allport (admitted pro hac vice) LEVIN SCHREDER & CAREY LTD. 120 North LaSalle Street, Floor 38 Chicago, IL 60602

Telephone: (312) 332-6300 Facsimile: (312) 332-6393 Email: pallport@lsclaw.com

CERTIFICATE OF SERVICE

I, Peter B. Allport, hereby certify that on **February 20, 2025**, I electronically filed this Notice of Filing of Proposed Global Settlement Agreement with the Clerk of the United States District Court for the Northern District of Texas by using the CM/ECF system, which will send a notice of electronic filing for such filing to all counsel of record.

<u>/s/ Peter B. Allport</u> 1206182.2